

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
RECEIVED LAFAYETTE

UNITED STATES DISTRICT COURT

MAR 7 2016

WESTERN DISTRICT OF LOUISIANA

TONY P. MOORE, CLERK  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE, LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 6:16-cr-0045
	*	18 U.S.C. §§ 242, 2
VERSUS	*	
	*	JUDGE <del>DRELL</del> MINALDI
JASON COMEAUX	*	MAGISTRATE JUDGE WHITEHURST

**BILL OF INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**INTRODUCTION**

At all times relevant to the Bill of Information:

- (1) The Defendant was employed as a member of the Narcotics Unit by the Iberia Parish Sheriff's Office (IPSO) in New Iberia, Louisiana.
- (2) Inmate A.D was a pre-trial detainee housed at the IPJ.

**COUNT 1**  
**CIVIL RIGHTS CONSPIRACY**  
**18 U.S.C. § 241**

On or about April 29, 2011, at the Iberia Parish Jail (IPJ) in the Western District of Louisiana, the Defendant, JASON COMEAUX, willfully combined, conspired, and agreed with other law enforcement officers to injure, oppress, threaten, and intimidate inmates, including A.D., in the free exercise and enjoyment of the right, secured and protected by the Constitution and laws of the United States, not to be deprived of liberty

without due process of law, which includes the right to be free from the use of excessive force amounting to punishment by a law enforcement officer.

Specifically, the Defendant agreed with other officers to unjustifiably assault and injure restrained and/or compliant inmates in the chapel at the IPJ, where there were no video surveillance cameras. It was part of the agreement that officers who witnessed these unlawful assaults would not intervene to stop them.

**COUNT 2**  
**DEPRIVATION OF RIGHTS UNDER COLOR OF LAW**  
**18 U.S.C. § 242**

On or about April 29, 2011, at the Iberia Parish Jail (IPJ) in the Western District of Louisiana, the Defendant, JASON COMEAUX, while acting under color of law and while aided and abetted by others, willfully deprived A.D., a pre-trial detainee, of the right, protected and secured by the Constitution and laws of the United States, not to be deprived of liberty without due process of law, which includes the right to be free from the use of excessive force amounting to punishment by a law enforcement officer. Specifically, the Defendant and other officers assaulted inmate A.D. in the chapel of the IPJ, a place not covered by the jail's video surveillance system. The offense involved the use of a dangerous weapon (a baton), and resulted in bodily injury to A.D.

**COUNT 3**  
**CONSPIRACY TO OBSTRUCT**  
**18 U.S.C. § 371**

From on or about April 29, 2011, until in or about February 2016, in the Western District of Louisiana, the Defendant, JASON COMEAUX, willfully combined, conspired, and agreed with other IPSO employees to knowingly engage in misleading conduct toward others in order to hinder, delay and prevent the communication to a federal law enforcement officer and federal judge of information relating to the commission and possible commission of a federal offense, in violation of 18 U.S.C. § 1512(b)(3). It was the plan and purpose of this conspiracy that the Defendant and his co-conspirators would cover up the unlawful assaults of inmates in the chapel (referred to in Count 1) by providing false and misleading statements in civil proceedings regarding those assaults.

**Overt Acts**

In furtherance of the conspiracy, and to effect the object thereof, the Defendant and his co-conspirators committed the following overt acts, among others, in the Western District of Louisiana:

(1) The Defendant met with a senior IPSO employee who told the Defendant to come up with a false story to cover up the unlawful beating of A.D.;

(2) The Defendant met with other officers involved in the beating of A.D., told them what the senior IPSO employee had said, and together came up with a false story to provide in the depositions;

(3) At the direction of the senior IPSO employee, the Defendant and the other officers provided false testimony during their depositions.

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